Comments on CALFED's Ecosystem Restoration Program Plan

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Volume I: Ecological Zone Visions

GENERAL:

Pages 35-79: Tier structure (Stressors > Goals > Ecosystem Quality Objectives > Implementation Objectives > Targets > Programmatic Actions > Elements > etc.) is complex and can be confusing. Please create a graphic that illustrates this structure and insert it periodically in the document. Use font variations and layout cues to help reader follow tiering discussion in the text.

Page 2, Page 31: We all recognize that the striped bass sport fishery is important to the public. However, a credible ecosystem "restoration" plan should not include non-native fish (or plants) as indicators of or targets for ecosystem health. Constructing striped bass hatcheries would add insult to injury. Striped bass population improvements will follow on the coattails of management actions targeting native fish recovery.

SPECIFIC:

XIII: Include boat wakes as a stressor.

XIV: Why just one plant species? What about other T&E?

Page 2: Specifically identify the benefit of protection and enhancement of in-channel islands for fishery recovery.

Page 3, ¶6: Marginal agricultural land? Where does this exist in the Delta. Delta interests won't like this.

Page 4, ¶1: How can you increase recreational boating and reduce environmental impacts? ¶2: How about including exotic or introduced fish species in this vision? ¶3 How will you protect levees from increased public use?

Page 5, ¶3: Channels are also navigation features.

Page 5, ¶3, Page 6. Is it useful to compare habitat values or extent between 1906 and 1993 if your restoration target date is circa 1960?

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Page 8, ¶2: Corps flood control dredging in 1910 era resulted in major changes in the Sacramento River.

Page 12: Land ownership (like West Delta section) includes; DWR-Grizzly Slough, COE/USBR-Prospect Island, USFWS-Stone Lakes NWR, DFG-Delta Meadows, etc.

Page 13, ¶3: Increased flows in Steamboat and Miner Sloughs would increase erosion.

Page 15, Page 17: Use same terms for habitat in tables and text. I.e. woody riparian and woody vs. riparian and oak woodland.

Page 18, ¶3: Discuss impacts of dissolved oxygen sag near Port of Stockton. ¶5: Potential agricultural impacts.

Page 20, ¶1: How has subsidence led to "serious potential erosion of the levees..."? ¶2: Mention other public land holdings; Franks Tract, Little Franks Tract, Lower Sherman Island, Rhoad Island.

Page 21, ¶2: Donlon Island was not <u>reclaimed</u> but rather <u>converted</u> from open, shallow water to emergent tidal wetland. ¶4: Marinas may have difficulty surviving if deeper, navigation channels are filled for habitat. ¶5: Flood relief islands don't work well in the West Delta...expensive.

Page 26, Level 3: How about wildlife easements along interior toe of levees and enlarging and modifying agricultural ditches to support wildlife habitat? Include a category for Invasive Terrestrial Vegetation Control. Include beneficial reuse of dredged material under Delta Levee Maintenance.

Page 27, Deltawide, ¶2: SB 34 has already adopted modified vegetation management guidelines for nonproject levees in the Delta. They have been approved by OES and FEMA. I suggest you incorporate them into the ERPP. What is the "Delta wide levee design plan"?

Page 28, ¶3 & 4: There are serious conflicts between developing new water-side benches and the potential conflict with shallow-water habitat used by delta smelt. ¶4: We will have to expand AB 360's Vegetation Management Guidelines for Local, Nonproject Levees in the Delta to include accommodation for project levees.

Page 29, ¶1: Subsidence mitigation with dredged material results in a settlement issue.

Page 30, ¶5: This is a big policy issue since it ignores the DWR South Delta Water Agency contract!!!

Page 31 Hatchery Program: Isn't there a fundamental conflict between striped bass production and their predation on smelt, salmon and other native fishes? Other Actions: City of Stockton waste water treatment plant dissolved oxygen problem needs to be listed.

Page 32, Table 1: What about Central and West Delta Unit?

Page 33, ¶1: What Army Corps of Engineers program? Add AB 360 program ¶2: Add AB 360.

Page 35, P.Action 3: Old and Middle Rivers...attractive nuisance?

Page 37, P. Action 1: There is serious debate as to whether DFG's dredging guidelines are workable. The 6-week work window will probably have a significant effect on getting necessary levee maintenance work done. P.Action 2: It will take many more material stockpiles to service the Delta's needs.

Volume II: Resource Visions

H1 Page 281: Setback levees don't buy you anything in the West and Central Delta. Filter out irrelevant text.

H2 Page 282: Wind erosion, burning and peat consolidation were considered a cause of subsidence but are insignificant compared to oxidation today. **Subsidence is not caused by shrinkage of peat.** Channels in the Western Delta are wide, not narrow. Riprap is needed to protect the levees from wind and boat generated waves. It is questionable whether a % increase of riprap in the Delta is applicable.

H3 Page 284: "Levees set back to higher, firmer ground are more reliable.." This normally doesn't apply to Central and Western Delta. Subsidence mitigation using dredged material will result in settlement of peat.

H4 Page 285: Link activities to the AB 360 program; Decker Island wetland restoration and Sherman Island habitat berm.

H5 Page 287, ¶1: Who defines "necessary dredging"?

H6 Page 289, ¶1: Mention exploring the use of sediment traps. Linkage: Need to specifically address Corps' policies to comply with the Water Resources Development Act of 1996.